

in Claims 13, 8-9, and 20-22 are not obvious in view of Sirola et al. and Lueders taken alone or in combination.

Applicant respectfully states that Claim 1 includes the limitation "a flexible display panel forming a first layer of the user interface." This limitation is supported in the specification in numerous places. This limitation is not taught or rendered obvious over Sirola et al. in view of Lueders.

The rejection states that Sirola et al. does not show a flexible display panel. Applicant agrees with the rejection that Sirola et al. does not show a flexible display panel but instead shows a rigid LCD display. Therefore, Applicant respectfully points out that Sirola et al. as understood by the Applicant and stated in the rejection utilizes an LCD display which is similar to the prior art material disclosed in the background. Furthermore, Sirola et al. does not teach or show motivation for changing the display to a flexible display panel as claimed.

Specifically, in the background of the instant application, a plurality of problems with LCD displays are outlined (e.g., thick, rigid, relatively heavy, visible from one position, difficult to see, require backlighting for illumination of the display area, etc.) Furthermore, the background of the instant application describes further drawbacks of an LCD display in conjunction with a touch panel (e.g., parallax effect). These problems are not addressed or taught by the cited combination. Specifically, Sirola et al. does not teach or mention the issues as addressed in the background of the instant application. Therefore, Applicant respectfully submits that Sirola et al. does

not render obvious the claimed limitation of "a flexible display panel forming a first layer of the user interface," nor does Sirola et al. suggest or show motivation for modifying his art to make obvious the claimed limitation.

The teachings of Lueders alone or in combination with Sirola et al. fail to render obvious the claimed invention because Lueders does not remedy the defects of Sirola et al. as discussed above. As the rejection states, Applicant understands Lueders to teach a flexible display panel over an apparatus having a plurality of keys. Lueders does not teach the replacement of an LCD display with the flexible display panel. In fact, as Applicant understands Lueders, a rigid LCD display would not be possible as a replacement for the flexible display panel, as the flexible display panel is necessary to ensure that Lueders can indent the screen enough to make contact with the plurality of keys below the flexible display panel.

Applicant respectfully states that Sirola et al. has a touch screen which works in a method that is fundamentally different than that of Lueders. Specifically, Lueders utilizes a flexible display panel to allow contact with keyboard keys below the flexible display. However, Sirola et al. has a touch screen that uses sensing technology to recognize contact on the touch sensor portion above the LCD. Thus, there is also no suggestion or motivation by Sirola et al. to modify his invention to reach the desirability of the claimed invention. Furthermore, the technology in general, and the flexible display panel in particular, as used by Lueders is incongruous with Sirola et al. and as such, both teach completely distinct methods of inputting data with touch screen technology. Therefore, neither of which, alone or in combination, would motivate the claimed invention.

With further respect to Claim 1 the limitation of, "a flexible touch sensor" is also stated. This limitation is supported in the specification in numerous places. This limitation is not taught or rendered obvious over Sirola et al. in view of Lueders.

The rejection states that Sirola et al. teaches a flexible touch sensor coupled with the rigid display panel. However, the Applicant has reviewed Sirola et al. and understands Sirola et al. to teach (column 5 lines 1-5) an activation means device formed advantageously to have the same size with the touch sensitive display, forming a thoroughly transparent and flexible foil-like activation means. That is, the Applicant understands Sirola et al. to teach the activation means to be flexible, not the touch sensitive display. In addition, since Applicant understands Sirola et al. to teach a rigid LCD display, Sirola et al. have no reason to use a flexible touch sensitive display. Therefore, Applicant respectfully states that Sirola et al. do not teach nor render obvious the use of a flexible touch sensitive display.

The teachings of Lueders alone or in combination with Sirola et al. fail to render obvious the claimed limitation of, "a flexible touch sensor" because Lueders does not remedy the defects of Sirola et al. as discussed above. As the rejection states, Applicant understands Lueders to teach a flexible display panel over an apparatus having a plurality of keys. Lueders does not teach a flexible touch sensor at all. In fact, Applicant understands Lueders to use keys below the flexible panel instead of a touch sensor.

In sum, Applicant respectfully states that neither Sirola et al. nor Lueders teaches or render obvious the limitations of Claim 1. Furthermore, Applicant respectfully states the combination of Sirola et al. and Lueders fails to teach or render obvious the limitations of Claim 1.

With reference now to Claims 20, Applicant respectfully states that Claim 1 includes the limitation "a flexible display panel forming a first layer of the user interface." This limitation is supported in the specification in numerous places. This limitation is not taught or rendered obvious over Sirola et al. in view of Lueders.

The rejection states that Sirola et al. does not show a flexible display panel. Applicant agrees with the rejection that Sirola et al. does not show a flexible display panel but instead shows a rigid LCD display. Therefore, Applicant respectfully points out that Sirola et al. as understood by the Applicant and stated in the rejection utilizes an LCD display which is similar to the prior art material disclosed in the background. Furthermore, Sirola et al. does not teach or show motivation for changing the display to a flexible display panel as claimed.

Specifically, in the background of the instant application, a plurality of problems with LCD displays are outlined (e.g., thick, rigid, relatively heavy, visible from one position, difficult to see, require backlighting for illumination of the display area, etc.). Furthermore, the background of the instant application describes further drawbacks of an LCD display in conjunction with a touch panel (e.g., parallax effect). These problems are not addressed or taught by the cited combination. Specifically, Sirola et al. does

not teach or mention the issues as addressed in the background of the instant application. Therefore, Applicant respectfully submits that Sirola et al. does not render obvious the claimed limitation of "a flexible display panel forming a first layer of the user interface," nor does Sirola et al. suggest or show motivation for modifying his art to make obvious the claimed limitation.

The teachings of Lueders alone or in combination with Sirola et al. fail to render obvious the claimed invention because Lueders does not remedy the defects of Sirola et al. as discussed above. As the rejection states, Applicant understands Lueders to teach a flexible display panel over an apparatus having a plurality of keys. Lueders does not teach the replacement of an LCD display with the flexible display panel. In fact, as Applicant understands Lueders, a rigid LCD display would not be possible as a replacement for the flexible display panel, as the flexible display panel is necessary to ensure that Lueders can indent the screen enough to make contact with the plurality of keys below the flexible display panel.

Applicant respectfully states that Sirola et al. has a touch screen which works in a method that is fundamentally different than that of Lueders. Specifically, Lueders utilizes a flexible display panel to allow contact with keyboard keys below the flexible display. However, Sirola et al. has a touch screen that uses sensing technology to recognize contact on the touch sensor portion above the LCD. Thus, there is also no suggestion or motivation by Sirola et al. to modify his invention to reach the desirability of the claimed invention. Furthermore, the technology in general and the flexible display panel in particular as used by Lueders is incongruous with Sirola et al. and as such, both teach completely distinct methods of inputting data with touch

screen technology. Therefore, neither of which, alone or in combination, would motivate the claimed invention.

With further respect to Claim 20 the limitation of, "a flexible touch sensor" is also stated. This limitation is supported in the specification in numerous places. This limitation is not taught or rendered obvious over Sirola et al. in view of Lueders.

The rejection states that Sirola et al. teaches a flexible touch sensor coupled with the rigid display panel. However, the Applicant has reviewed Sirola et al. and understands Sirola et al. to teach (column 5 lines 1-5) an activation means device formed advantageously to have the same size with the touch sensitive display, forming a thoroughly transparent and flexible foil-like activation means. That is, the Applicant understands Sirola et al. to teach the activation means to be flexible, not the touch sensitive display. In addition, since Applicant understands Sirola et al. to teach a rigid LCD display, Sirola et al. have no reason to use a flexible touch sensitive display. Therefore, Applicant respectfully states that Sirola et al. do not teach nor render obvious the use of a flexible touch sensitive display.

The teachings of Lueders alone or in combination with Sirola et al. fail to render obvious the claimed limitation of, "a flexible touch sensor" because Lueders does not remedy the defects of Sirola et al. as discussed above. As the rejection states, Applicant understands Lueders to teach a flexible display panel over an apparatus having a plurality of keys. Lueders does not teach a flexible touch sensor at all. In fact, Applicant understands Lueders to use keys below the flexible panel instead of a touch sensor.

In sum, Applicant respectfully states that neither Sirola et al. nor Lueders teaches or render obvious the limitations of Claim 20. Furthermore, Applicant respectfully states the combination of Sirola et al. and Lueders fails to teach or render obvious the limitations of Claim 20.

Furthermore, Applicant respectfully submits that the rejection of Independent Claims 1 and 20 under 35 U.S.C. § 103(a) has been overcome, and that Independent Claims 1 and 20 are in condition for allowance. Additionally, Claims 2-9 are dependent on Independent Claim 1 and Claims 21-25 are dependent on Independent Claim 20. Accordingly, Applicant also respectfully submits that the rejection of Claims 2-9 and Claims 21-25 under 35 U.S.C. § 103(a) has been overcome, as these claims are dependent on allowable base claims and recite additional limitations.

In the Office Action, Claims 10-13 and 18-19 under 35 USC 103(a) are rejected as being unpatentable over Kikinis et al. (5,634,080) in view of Lueders (6,067,074). Applicant has reviewed Kikinis et al. in view of Lueders, and respectfully submits that the embodiments of the present invention as recited in Claims 10-13 and 18-19 are not obvious in view of Kikinis et al. and Lueders taken alone or in combination.

Applicant respectfully states that Claim 10 includes the limitation "a flexible display panel forming a first layer of a user interface." This limitation is supported in the specification in numerous places. This limitation is not taught or rendered obvious over Kikinis et al. in view of Lueders.

The rejection states that Kikinis et al. does not show a flexible display panel. Applicant agrees with the rejection that Kikinis et al. does not show a flexible display panel but instead shows a rigid LCD display. Therefore, Applicant respectfully points out that Kikinis et al. as understood by the Applicant and stated in the rejection utilizes an LCD display which is similar to the prior art material disclosed in the background. Furthermore, Kikinis et al. does not teach or show motivation for changing the display to a flexible display panel as claimed.

Specifically, in the background of the instant application, a plurality of problems with LCD displays are outlined (e.g., thick, rigid, relatively heavy, visible from one position, difficult to see, require backlighting for illumination of the display area, etc.). Furthermore, the background of the instant application describes further drawbacks of an LCD display in conjunction with a touch panel (e.g., parallax effect). These problems are not addressed or taught by the cited combination. Specifically, Kikinis et al. does not teach or mention the issues as addressed in the background of the instant application. Therefore, Applicant respectfully submits that Kikinis et al. does not render obvious the claimed limitation of "a flexible display panel forming a first layer of the user interface," nor does Kikinis et al. suggest or show motivation for modifying his teaching to realize the claimed limitation.

The teachings of Lueders alone or in combination with Kikinis et al. fail to render obvious the claimed invention because Lueders does not remedy the defects of Kikinis et al. as discussed above. As the rejection states, Applicant understands Lueders to teach a flexible display panel over an apparatus having a plurality of keys. Lueders does not teach the replacement

of an LCD display with the flexible display panel. In fact, as Applicant understands Lueders, a rigid LCD display would not be possible as a replacement for the flexible display panel, as the flexible display panel is necessary to ensure that Lueders can indent the screen enough to make contact with the plurality of keys below the flexible display panel.

Applicant respectfully states that Kikinis et al. has a touch screen which works in a method that is fundamentally different than that of Lueders. Specifically, Lueders utilizes a flexible display panel to allow contact with keyboard keys below the flexible display. However, Kikinis et al. has a touch screen that uses sensing technology to recognize contact on the touch sensor portion above the LCD. Thus, there is also no suggestion or motivation by Kikinis et al. to modify his invention to reach the desirability of the claimed invention. Furthermore, the technology in general, and the flexible display panel in particular, as used by Lueders is incongruous with Kikinis et al. and as such, both teach completely distinct methods of inputting data with touch screen technology. Therefore, neither of which, alone or in combination, would motivate the claimed invention.

With further respect to Claim 10 the limitation of, "a flexible touch sensor" is also stated. This limitation is supported in the specification in numerous places. This limitation is not taught or rendered obvious over Kikinis et al. in view of Lueders.

The rejection states that Kikinis et al. teaches a flexible touch sensor coupled with the rigid display panel. However, the Applicant has reviewed Kikinis et al. and understands Kikinis et al. to teach a rigid LCD display.

Therefore, Kikinis et al. have no reason to use a flexible touch sensitive display on a rigid LCD display. Thus, Applicant respectfully states that Kikinis et al. do not teach nor render obvious the use of a flexible touch sensitive display.

The teachings of Lueders alone or in combination with Kikinis et al. fail to render obvious the claimed limitation of, "a flexible touch sensor" because Lueders does not remedy the defects of Kikinis et al. as discussed above. As the rejection states, Applicant understands Lueders to teach a flexible display panel over an apparatus having a plurality of keys. Lueders does not teach a flexible touch sensor at all. In fact, Applicant understands Lueders to use keys below the flexible panel instead of a touch sensor.

In sum, Applicant respectfully states that neither Kikinis et al. nor Lueders teaches or render obvious the limitations of Claim 10. Furthermore, Applicant respectfully states the combination of Kikinis et al. and Lueders fails to teach or render obvious the limitations of Claim 10.

Furthermore, Applicant respectfully submits that the rejection of Independent Claim 10 under 35 U.S.C. § 103(a) has been overcome, and that Independent Claim 10 is in condition for allowance. Additionally, Claims 11-19 are dependent on Independent Claim 10. Accordingly, Applicant also respectfully submits that the rejection of Claims 11-19 under 35 U.S.C. § 103(a) has been overcome, as these claims are dependent on allowable base claims and recite additional limitations.

Claims 4-5 and 23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Sirola et al. and Lueders in view of Colgan et al. (6,438,498). Applicant has reviewed Sirola et al. and Lueders in view of Colgan et al., and respectfully submits that the embodiments of the present invention as recited in Claims 4-5 and 23 are not obvious in view of Sirola et al., Lueders, and Colgan et al., taken alone or in combination.

Applicant respectfully submits that the rejection of Independent Claims 1, and 20 under 35 U.S.C. § 103(a) has been overcome, and that Independent Claims 1, and 20 are in condition for allowance. Additionally, Claims 4-5 are dependent on Independent Claim 1 and Claim 23 is dependent on Independent Claim 20. Accordingly, Applicant also respectfully submits that the rejection of Claims 4-5 and 23 under 35 U.S.C. § 103(a) has been overcome, as these claims are dependent on allowable base claims and recite additional limitations.

Claims 14 and 15 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Sirola et al. and Lueders in view of Colgan et al. Applicant has reviewed Sirola et al. and Lueders in view of Colgan et al., and respectfully submits that the embodiments of the present invention as recited in Claims 4-5 and 23 are not obvious in view of Sirola et al., Lueders, and Colgan et al., taken alone or in combination.

Applicant respectfully submits that the rejection of Independent Claim 10 under 35 U.S.C. § 103(a) has been overcome, and that Independent Claim 10 is in condition for allowance. Additionally, Claims 14 and 15 are dependent on Independent Claim 10. Accordingly, Applicant also respectfully

submits that the rejection of Claims 14 and 15 under 35 U.S.C. § 103(a) has been overcome, as these claims are dependent on allowable base claims and recite additional limitations.

Claims 7 and 25 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Sirola et al. and Lueders in view of Lui et al. (6,256,009). Applicant has reviewed Sirola et al. and Lueders in view of Lui et al., and respectfully submits that the embodiments of the present invention as recited in Claims 7 and 25 are not obvious in view of Sirola et al., Lueders, and Lui et al., taken alone or in combination.

Applicant respectfully submits that the rejection of Independent Claims 1 and 20 under 35 U.S.C. § 103(a) has been overcome, and that Independent Claims 1 and 20 are in condition for allowance. Additionally, Claim 7 is dependent on Independent Claim 1 and Claim 25 is dependent on Independent Claim 20. Accordingly, Applicant also respectfully submits that the rejection of Claims 7 and 25 under 35 U.S.C. § 103(a) has been overcome, as these claims are dependent on allowable base claims and recite additional limitations.

Claim 17 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Sirola et al. and Lueders in view of Lui et al. Applicant has reviewed Sirola et al. and Lueders in view of Lui et al., and respectfully submits that the embodiments of the present invention as recited in Claim 17 is not obvious in view of Sirola et al., Lueders and Lui et al., taken alone or in combination.

Applicant respectfully submits that the rejection of Independent Claim 10 under 35 U.S.C. § 103(a) has been overcome, and that Independent Claim 10 is in condition for allowance. Additionally, Claim 17 is dependent on Independent Claim 10. Accordingly, Applicant also respectfully submits that the rejection of Claim 17 under 35 U.S.C. § 103(a) has been overcome, as these claims are dependent on allowable base claims and recite additional limitations.

Claims 6 and 24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Sirola et al. and Lueders in view of Sandbach et al. (6,333,736). Applicant has reviewed Sirola et al. and Lueders in view of Sandbach et al., and respectfully submits that the embodiments of the present invention as recited in Claims 6 and 24 are not obvious in view of Sirola et al., Lueders, and Sandbach et al., taken alone or in combination.

Applicant respectfully submits that the rejection of Independent Claims 1 and 20 under 35 U.S.C. § 103(a) has been overcome, and that Independent Claims 1 and 20 are in condition for allowance. Additionally, Claim 6 is dependent on Independent Claim 1 and Claim 24 is dependent on Independent Claim 20. Accordingly, Applicant also respectfully submits that the rejection of Claims 6 and 24 under 35 U.S.C. § 103(a) has been overcome, as these claims are dependent on allowable base claims and recite additional limitations.

Claim 16 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Sirola et al. and Lueders in view of Sandbach et al. Applicant has reviewed Sirola et al. and Lueders in view of Sandbach et al., and respectfully submits

that the embodiments of the present invention as recited in Claim 16 is not obvious in view of Sirola et al., Lueders and Sandbach et al., taken alone or in combination.

Applicant respectfully submits that the rejection of Independent Claim 10 under 35 U.S.C. § 103(a) has been overcome, and that Independent Claim 10 is in condition for allowance. Additionally, Claim 16 is dependent on Independent Claim 10. Accordingly, Applicant also respectfully submits that the rejection of Claim 16 under 35 U.S.C. § 103(a) has been overcome, as these claims are dependent on allowable base claims and recite additional limitations.

References cited

The Applicant has reviewed the references which were cited but not relied on, and believes the present invention as claimed to overcome the references.

CONCLUSION

In light of the above remarks, Applicant respectfully requests reconsideration of the rejected Claims 1-25.

Based on the argument presented above, Applicant respectfully asserts that Claims 1 through 25 overcome the rejections of record and, therefore, allowance of these Claims is respectfully solicited.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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